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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.

No. CR 05-00589-JF

ALEXANDER DZHUGA,
a/k/a Aleksandr Dhuga,
a/k/a Aleksandr Dzhuga,
LEONID DZHUGA,
VLADIMIR A. SEMENOV,
NATALIA IGOREVNA STADNIK,
a/k/a Natalia Stadnik Dzhuga, and
ARMOND TENNYSON TOLLETTE II,
a/k/a Armond T. Tollette, Jr.,
Defendants.

STIPULATION AND ~~PROPOSED~~
ORDER TO EXCLUDE TIME UNDER
THE SPEEDY TRIAL ACT FROM JULY
12, 2006 TO SEPTEMBER 27, 2006

STIPULATION

1. The parties in the above-captioned case appeared before the Court on July 12, 2006 for a status conference. At that time, the government informed the Court that the Assistant United States Attorney (AUSA) handling this case will be leaving the office for a detail to the District of

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1 Hawaii. The case will be reassigned to a new AUSA, who will be joining the office at the end of
2 the month. Defense counsel also informed the Court of various conflicts in their schedules that
3 did not allow for another status hearing until September 27, 2006. The parties requested a
4 continuance to September 27, 2006, for a status conference.

5 2. All counsel agreed and stipulated that time should be excluded from July 12, 2006 through
6 and including September 27, 2006 from the Speedy Trial Act under 18 U.S.C. §§ 3161(h)(8)(A)
7 and (B)(iv) in order to allow for continuity of counsel for both the United States and for each of
8 the defendants.

9 SO STIPULATED.

10 DATED: 6/27/06

/s/
11 MARK J. WERKSMAN
12 Attorney for Defendant A. Dzhuga

13 DATED: 6/28/06

/s/
14 DMITRY Y. GUROVICH
15 Attorney for Defendant
L. Dzhuga

16 DATED: 6/26/06

/s/
17 GEOFFREY BRAUN
18 Attorney for Defendant Semenov

19 DATED: 6/28/06

/s/
20 ELON BERK
21 Attorney for Defendant Stadnik

22 DATED: 7/25/06

/s/
23 KURT ROBINSON
24 Attorney for Defendant Tollette

25 DATED: 7/25/06

/s/
26 CANDACE KELLY
27 Assistant United States Attorney
28

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ORDER

The Court finds that there is good cause for the extension of time described above, and that the ends of justice served by granting this continuance outweigh the best interests of the public and of the defendants in a speedy trial and the prompt disposition of criminal cases. 18 U.S.C. § 3161(h)(8)(A). The Court further finds that failure to grant the continuance would deny the government and the defendants continuity of counsel under 18 U.S.C. § 3161(h)(8)(B)(iv).

Accordingly, and with the consent of the defendants, the Court continues the matter to September 27, 2006 at 9:00 a.m. for further status and orders that the period from July 12, 2006 through and including September 27, 2006 be excluded from the Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

IT IS SO ORDERED.

DATED: 7/27/06



JEREMY FOGEL
UNITED STATES DISTRICT JUDGE